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 6 *Attorney for Plaintiffs*

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**UNITED STATES DISTRICT COURT**  
 8  
**DISTRICT OF NEVADA**

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10  
 11 TAYLOR SOMMER, individually; TAYLOR  
 12 SOMMER, as the Administrator of the ESTATE  
 13 OF REINER SHAWN SOMMER, deceased,

14 Plaintiffs,

Case No.: 2:23-cv-01682-GMN-NJK

15 vs.  
 16 CITY OF LAS VEGAS, NEVADA, a political  
 subdivision of the State of Nevada; LAS  
 17 VEGAS METROPOLITAN POLICE  
 18 DEPARTMENT, a political subdivision of the  
 19 State of Nevada; KEVIN McMAHILL,  
 20 individually and as a policy maker and Sheriff of  
 LAS VEGAS METROPOLITAN POLICE  
 21 DEPARTMENT; SERGEANT GERALD  
 22 BAGAPORO, individually and in his official  
 capacity; SERGEANT JEFFREY BLUM,  
 23 individually and in his official capacity;  
 OFFICER ANDREW GARCIA, individually  
 24 and in his official capacity; OFFICER JOSEPH  
 ORTEGA, individually and in his official  
 25 capacity; DOE LAS VEGAS METROPOLITAN  
 POLICE DEPARTMENT SUPERVISORS I  
 through X, inclusive; ROE LAS VEGAS  
 26 METROPOLITAN POLICE DEPARTMENT  
 OFFICERS XI through XX, inclusive,

**STIPULATION TO EXTEND TIME TO  
 RESPOND TO MOTION FOR SUMMARY  
 JUDGMENT [ECF #32] (FIRST REQUEST)**

27 Defendants.

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1 COMES NOW, Plaintiff, TAYLOR SOMMER, individually, and TAYLOR SOMMER, as  
2 the Administrator of the ESTATE OF REINER SHAWN SOMMER, deceased (*collectively*,  
3 “*Plaintiffs*”), and Defendants, LAS VEGAS METROPOLITAN POLICE DEPARTMENT;  
4 KEVIN McMAHILL; SERGEANT GERALD BAGAPORO; SERGEANT JEFFREY BLUM;  
5 OFFICER ANDREW GARCIA; and OFFICER JOSEPH ORTEGA (*collectively*, “*Defendants*”)  
6 by and through their undersigned counsel of record, and hereby stipulate and agree as follows:  
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- 8 1. The Defendants hereto filed a Motion for Summary Judgment on January 10, 2025 [ECF  
9 #32]. A response to said Motion is presently due on or about January 31, 2025.
- 10 2. Plaintiff’s counsel has a number of other work obligations which have greatly reduced the  
11 time available to respond to the subject motion.
- 12 3. Based upon the foregoing, Plaintiffs’ counsel has requested and shall be granted an  
13 extension of time in which to respond to Defendants’ Motion for Summary Judgment until  
14 February 14, 2025.
- 15 4. The requested extension should not interfere with the parties’ ability to complete briefing  
16 in advance of the settlement conference that is scheduled to take place on March 24, 2025  
17 [ECF #35].

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1           5. This Stipulation is made in good faith and not for purpose of delay.

2           DATED this 29<sup>th</sup> day of January, 2025.

<p>3</p> <p><b>ROGER P. CROTEAU &amp; ASSOCIATES, LTD.</b></p> <p>4</p> <hr/> <p>5           <i>/s/ Timothy E. Rhoda</i></p> <p>6           ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 TIMOTHY E. RHODA, ESQ. Nevada Bar No. 7878 2810 West Charleston Blvd., #67 Las Vegas, Nevada 89102 702-254-7775 <a href="mailto:croteaulaw@croteaulaw.com">croteaulaw@croteaulaw.com</a> <i>Attorney for Plaintiffs</i></p>	<p>3</p> <p><b>MARQUIS &amp; AURBACH</b></p> <p>4</p> <hr/> <p>5           <i>/s/ Craig R. Anderson</i></p> <p>6           CRAIG R. ANDERSON, ESQ. Nevada Bar No. 6882 10001 Park Run Drive Las Vegas, Nevada 89145 702-382-0711 <a href="mailto:canderson@maclaw.com">canderson@maclaw.com</a> <i>Attorney for Defendants</i></p>
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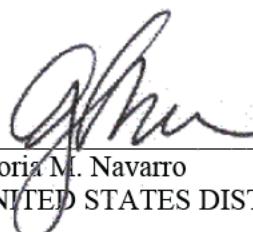
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14           **IT IS SO ORDERED:**

15           Dated this 30 day of January, 2025.

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Gloria M. Navarro  
UNITED STATES DISTRICT JUDGE

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17<sup>th</sup> day of January, 2025, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION TO EXTEND TIME TO RESPOND TO MOTION FOR SUMMARY JUDGMENT [ECF #32]** (**FIRST REQUEST**) to the following parties:

Craig R. Anderson  
Marquis & Aurbach  
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702-382-5816 (fax)  
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*Attorney for Defendants*

/s/ Timothy E. Rhoda

An employee or agent of ROGER P.  
CROTEAU & ASSOCIATES, LTD.  
*Attorneys for Plaintiffs*